

1 Vanessa R. Waldref  
2 United States Attorney  
3 Eastern District of Washington  
4 David M. Herzog  
5 Assistant United States Attorney  
6 Post Office Box 1494  
7 Spokane, WA 99210-1494  
8 Telephone: (509) 353-2767

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
NOV 16 2021  
SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TREVER DANIEL HARDER and  
15 KYLIE RUBY FLORES,

16 Defendants.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

2:21-CR-165-TOR  
INDICTMENT

Vio: 18 U.S.C. § 1594(c)  
Conspiracy to Commit Child Sex  
Trafficking  
(Count 1)

18 U.S.C. § 1591(a)(1), (b)(1)  
Child Sex Trafficking  
(Count 2)

18 U.S.C. §§ 1591(a)(2), (b)(1),  
1594(a)  
Benefiting From Child Sex  
Trafficking  
(Count 3)

18 U.S.C. § 2251(a), (e)  
Production of Child Pornography  
(Count 4)

18 U.S.C. §§ 1594, 2253  
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3  
4 From on or about February 2, 2021, through on or about July 26, 2021, within  
5 the Eastern District of Washington, the Defendants, TREVER DANIEL HARDER  
6 and KYLIE RUBY FLORES, in and affecting interstate commerce, knowingly  
7  
8 conspired, confederated, and agreed together and with each other to recruit, entice,  
9 harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any  
10 means Minor Victim 1, knowing and in reckless disregard of the fact, and having had  
11  
12 a reasonable opportunity to observe Minor Victim 1, that Minor Victim 1 had not  
13 attained the age of 14 years and would be caused to engage in a commercial sex act, in  
14 violation of 18 U.S.C. § 1591(a)(1), (b)(1); all in violation of 18 U.S.C. § 1594(c).

15  
16 COUNT 2

17 From on or about February 2, 2021, through on or about July 26, 2021, within  
18 the Eastern District of Washington, the Defendants, TREVER DANIEL HARDER  
19 and KYLIE RUBY FLORES, in and affecting interstate commerce, did knowingly  
20 recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and  
21 solicit by any means Minor Victim 1, knowing and in reckless disregard of the fact,  
22  
23 and having had a reasonable opportunity to observe Minor Victim 1, that Minor  
24 Victim 1 had not attained the age of 14 years and would be caused to engage in a  
25 commercial sex act, in violation of 18 U.S.C. § 1591(a)(1), (b)(1).  
26  
27  
28

## COUNT 3

From on or about February 2, 2021, through on or about July 26, 2021, within the Eastern District of Washington, the Defendant, KYLIE RUBY FLORES, in and affecting interstate commerce, did knowingly benefit financially and did receive something of value from participation in a venture which engaged in the recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means Minor Victim 1, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor Victim 1, that Minor Victim 1 had not attained the age of 14 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(2), (b)(1), and did attempt the same, in violation of 18 U.S.C. § 1594(a).

## COUNT 4

On or about July 8, 2021, in the Eastern District of Washington, the Defendant, TREVER DANIEL HARDER, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 1 to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction was produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and did attempt the same, in violation of 18 U.S.C. § 2251(a), (e).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. § 1594(c) as charged in Count 1 of this Indictment, and/or an offense in violation of 18 U.S.C. § 1591(a)(1), (b)(1), as charged in Count 2 of this Indictment, the Defendants, TREVER DANIEL HARDER and KYLIE RUBY FLORES, shall each forfeit to the United States of America any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense and/or offenses, and any property traceable to such property; and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense and/or offenses, and any property traceable to such property.


Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. §§ 1591(a)(2), (b)(1), 1594(a), as charged in Count 3 of this Indictment, the Defendant, KYLIE RUBY FLORES, shall forfeit to the United States of America any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense and/or offenses, and any property traceable to such property; and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense and/or offenses, and any property traceable to such property.

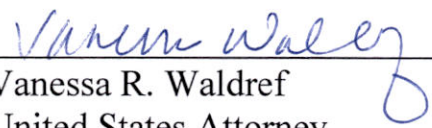
1 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18  
2 U.S.C. § 2251(a), (e), as charged in Count 4 of this Indictment, the Defendant,  
3  
4 TREVER DANIEL HARDER, shall forfeit to the United States any visual depiction  
5 described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or  
6 any book, magazine, periodical, film, videotape, or other matter which contains any  
7  
8 such visual depiction, which was produced, transported, mailed, shipped or received  
9 in violation of this chapter; any property, real or personal, constituting or traceable to  
10 gross profits or other proceeds obtained from such offenses; and, any property, real or  
11  
12 personal, used or intended to be used to commit or to promote the commission of such  
13 offenses, or any property traceable to such property.

14 If any such property, as a result of any act or omission of any Defendant:

- 15
- 16 a. cannot be located upon the exercise of due diligence;
  - 17 b. has been transferred or sold to, or deposited with, a third party;
  - 18 c. has been placed beyond the jurisdiction of the court;
  - 19
  - 20 d. has been substantially diminished in value; or
  - 21 e. has been commingled with other property which cannot be divided
  - 22 without difficulty,
  - 23
  - 24
  - 25
  - 26
  - 27
  - 28

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).  
3

4 DATED this 16th day of November 2021. 

5  
6  
7  
8   
9 Vanessa R. Waldref  
10 United States Attorney

11   
12 David M. Herzog  
13 Assistant United States Attorney  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28